

Greenbaum Rowe
Smith & Davis LLP
COUNSELORS AT LAW

METRO CORPORATE CAMPUS ONE
P.O. BOX 5600
WOODBRIIDGE, NJ 07095-0988
(732) 549-5600 FAX (732) 549-1881

DELIVERY ADDRESS: 99 WOOD AVENUE SOUTH, ISELIN, NJ 08830-2712

INFO@GREENBAUMLAW.COM
WWW.GREENBAUMLAW.COM

ROSELAND OFFICE:
75 LIVINGSTON AVENUE
SUITE 301
ROSELAND, NJ 07068-3701
(973) 535-1600
FAX (973) 535-1608

NEW YORK OFFICE:
747 THIRD AVENUE
2ND FLOOR
NEW YORK, NY 10017
(212) 847-9858

ALAN S. NAAR
(732) 476-2530 - DIRECT DIAL
(732) 476-2531 - DIRECT FAX
ANAAR@GREENBAUMLAW.COM

August 12, 2019

VIA ECF

Hon. Leda Dunn Wettre, U.S.M.J.
U.S. District Court
M. L. King, Jr. Federal Building & Courthouse
50 Walnut St., Room 2A
Newark, NJ 07102

Re: *Oz Master Fund Ltd., et al. v. Perrigo Co. plc, et al.*
Civil Action No. 2:19-cv-4900

Dear Judge Wettre:

This firm, together with Fried, Frank, Harris, Shriver & Jacobson LLP, represents Defendant Perrigo Company plc ("Perrigo") in the above-captioned action. On behalf of all parties, we write to respectfully request an extension of the November 15, 2019 fact discovery deadline to February 15, 2020 to conform to the deadlines in the other Individual Actions.¹

As the Court may recall, on June 27, 2019, the Court so-ordered the joint request of the parties to the Individual Actions to extend the fact discovery deadline of November 15, 2019 to February 15, 2020. *See* Order, Consolidated Class Action, ECF 207.² The above-captioned action was not included in the joint request. The purpose of this letter is to request that this

¹ The Individual Actions are: *Carmignac Gestion, S.A. v. Perrigo Co. plc et al.*, No. 2:17-cv-10467 (D.N.J.); *Manning & Napier Advisors, LLC v. Perrigo Co. plc et al.*, No. 2:18-cv-00674 (D.N.J.); *Mason Capital L.P. et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-01119 (D.N.J.); *Pentwater Equity Opportunities Master Fund Ltd. et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-01121 (D.N.J.); *Harel Insurance Company, Ltd. et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-02074 (D.N.J.); *First Manhattan Co. v. Perrigo Co. plc et al.*, No. 2:18-cv-02291 (D.N.J.); *TIAA-CREF Investment Management, LLC et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-08175 (D.N.J.); *Nationwide Mutual Funds et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-15382 (D.N.J.); *WCM Alternatives: Event-Driven Fund et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-16204 (D.N.J.); *Hudson Bay Master Fund Ltd. et al. v. Perrigo Co. plc et al.*, No. 2:18-cv-16206 (D.N.J.); *Schwab Capital Trust et al. v. Perrigo Co. plc et al.*, No. 2:19-cv-03973 (D.N.J.); *Aberdeen Canada Funds-Global Equity Fund et al. v. Perrigo Co. plc et al.*, No. 2:19-cv-06560 (D.N.J.).

² The Consolidated Class Action is *Roofer's Pension Fund v. Papa, et al.*, No. 2:16-cv-2805 (D.N.J.).

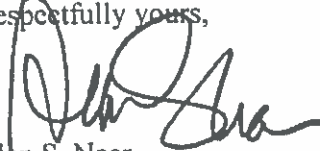
Greenbaum Rowe
Smith & Davis LLP

Hon. Leda Dunn Wettre, U.S.M.J.
August 12, 2019
Page 2

action be put on the same schedule as the other Individual Actions, such that the fact discovery deadline of November 15, 2019 is extended to February 15, 2020. *Cf.* Stipulation and Order, ECF 29 (directing the parties in this action to proceed in accordance with the discovery schedule in the Individual Actions).

For these reasons, the parties respectfully request that the fact discovery deadline in this action be extended from November 15, 2019 to February 15, 2020.

Respectfully yours,



Alan S. Naar

ASN:cd
cc: All counsel of record (via ECF)

So Ordered

this 13th day of August 2019



Leda D. Wettre, USMJ